



July 2024

LANGUAGE ACCESS POLICY

POLICY STATEMENT

It is the policy of Clearinghouse Community Development Financial Institution (“**CCDFI**”) to not discriminate against any person who may have Limited English Proficiency (“**LEP**”). As a Community Development Financial Institution (“**CDFI**”), CCDFI will provide timely, free, and meaningful access to all financial products and services to LEP individuals, based on the provisions set forth in the Language Assistance Plan (the “**LAP**”).

PURPOSE AND AUTHORITY

CCDFI is a full-service, direct lender financing projects that create jobs and services to help people work, live, dream, grow, and thrive in healthy communities. The company was established in 1996 to serve low-income and disadvantaged communities in Southern California. Since then, CCDFI has expanded its service area to address unmet credit needs throughout the U.S. and Indian Country. CCDFI’s mission is dedicated to providing economic opportunities and improving the quality of life for lower-income individuals and communities through innovative and affordable financing that is unavailable in the conventional market.

In accordance with this mission, CCDFI recognizes the importance of accessibility of its services and products to all members of the community. As such, the purpose of this Language Assistance Policy (this “**Policy**”) is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act, for CCDFI personnel to follow when providing services to, or interacting with, LEP individuals. Following this policy is essential to the success of CCDFI’s mission in ensuring reasonable access to LEP individuals.

To that end, LEP persons may request relevant materials from CCDFI via its website. CCDFI provides language assistance, on an as-available basis, using contractual services provided by third-party vendors. Upon request and within reasonable time restraints, CCDFI will provide translations of its program information into Spanish or other languages. CCDFI will decide how to allocate its resources for translation services based on relevance, time, or cost restraints.

POLICY REVIEW

This Policy and the language needs of CCDFI and its service population will be reviewed by management at least annually and approved by the Board of Directors each year.

LANGUAGE ACCESS PLAN

IDENTIFICATION OF LANGUAGE NEEDS

CCDFI staff shall conduct regular surveys and assessments to ensure equity and inclusion across service and product beneficiaries, and evaluate the number or proportion of LEP individuals serviced or encountered in eligible service populations. Because much of CCDFI's interaction with the public is through its website and online services, CCDFI will monitor the public's usage of its website by tracking downloads of translated brochures and program materials. CCDFI will also track the volume and nature of any language assistance requests, third-party vendor referral requests, and complaints received from the public.

PROVIDING LANGUAGE ASSISTANCE SERVICES

Based on the guidelines established in the LAP and the allocation of resources for these services, CCDFI will provide free language assistance for LEP individuals. CCDFI will decide how to allocate its resources for language assistance services based on relevance, time, and cost restraints.

CCDFI has reviewed both the language needs of its communities and the need to invest in written translation of certain documents it deems essential to LEP individuals, such as fact sheets about its programs, brochures, disclosures, and notices of rights. CCDFI is also implementing procedures to provide interpretation and translation services to LEP individuals upon request, through a contractual third-party referral service. All requests for language assistance services will go through CCDFI's LEP Coordinator at adminsupport@ccdfi.com.

This LAP shall be posted on CCDFI's website to provide notice of available language assistance services.

NOTICE OF LANGUAGE SERVICES

As much of CCDFI's interaction with the public is through its website, notice will be posted on the Frequently Asked Questions section of its website to inform the public of their right to language assistance services at no cost. Signage will be translated into Spanish as it is the language of LEP individuals most frequently encountered by CCDFI.

TRAINING AND COMPLIANCE

Based on resources available to CCDFI, its staff will receive training on the content of the language access policy, how to identify the need for language access services, how to work with LEP individuals, and how to provide language-accessible services in a culturally sensitive manner.

MONITORING AND ASSESSMENT

CCDFI shall be responsible for monitoring compliance with the organization's language access policy.

CCDFI shall collect information on language use and need, including primary languages of clients, distribution and download of translated materials, usage of interpretation services, frequency of contact with LEP individuals seeking services, and referrals of LEP individuals and the language of the referred LEP individual.

CCDFI shall conduct an annual review on the effectiveness of the language access policy and make changes as needed.

INTERNAL LANGUAGE ACCESS CONTACT

CCDFI's Language Access Coordinator can be reached at adminsupport@ccdfi.com.

COMPLAINT PROCESS

1. A complaint regarding the denial of language accessible services, or regarding the quality of language accessible services, including interpreters or translated materials, may be made in person, or in writing.
2. The complaint should specify the date, individuals involved, and the nature of the client (i.e. the interpreter was summarizing, or an LEP individual was denied services because they did not bring their own interpreter).
3. All complaints will be directed to adminsupport@ccdfi.com.
4. [Adminsupport@ccdfi.com](mailto:adminsupport@ccdfi.com) will notify the parties within 30 days upon receipt of the complaint of the outcome.
5. The complaint process will be included in the posted notification of the right to an interpreter.